

Renewables Portfolio Standard 2020 Annual Reporting Instructions for Postponed POU Reporting Requirements

The updates to the *Enforcement Procedures for the Renewables Portfolio Standard for Local Publicly Owned Electric Utilities (RPS POU Regulations)*, adopted by the California Energy Commission (CEC) in December 2020, were approved by the Office of Administrative Law (OAL), effective July 12, 2021. The Final Statement of Reasons, Final Express Terms, and OAL approval are available for review in the rulemaking docket, [16-RPS-03](#) (available at <https://efiling.energy.ca.gov/Lists/Docketlog.aspx?docketnumber=16-RPS-03>).

As noted in CEC staff's June 17, 2021 communication to local publicly owned electric utilities (POUs), instructions for POUs to submit Renewables Portfolio Standard (RPS) 2020 annual reports and supporting documentation are being made available concurrently with the effective date of the updates to the *RPS POU Regulations*. These instructions are divided into three sections:

- I. Annual Reporting Requirements for All POUs
- II. Annual Reporting Requirements for POUs Using Exemptions and Adjustments
- III. Reporting for POUs Electing Voluntary Early Compliance with the Long-Term Procurement Requirement for Compliance Period 3

Please note: the reporting deadline for POUs to submit RPS 2020 annual reports with supporting documentation is **August 13, 2021**. The instructions below summarize the 2020 annual reporting requirements that must be submitted by this reporting deadline.¹

I. Annual Reporting Requirements for All POUs

1. Annual Summary Report and Supporting Documentation

The CEC is tasked with verifying POU compliance with the RPS procurement requirements, as specified in the *RPS POU Regulations*. To demonstrate compliance with these requirements, POUs shall report general procurement and contractual information using the [RPS Online System](#) (available at <https://rps.energy.ca.gov/>). POUs must complete and attest to the Annual Summary Report in the RPS Online System. Further information on the requirements for annual summary reporting is provided in the [RPS Eligibility](#)

¹ As specified in section 3201 (i) and 3207 (d) of the updated *RPS POU Regulations*, RPS compliance reports for Compliance Period 3 are distinct from annual reports and now required to be submitted by POUs on a different schedule from annual reports. Specifically, compliance reports are due within 90 days of the POU's receipt of the Commission's draft verification results from CEC staff, rather than on July 1 or on the date identified in these instructions. Accordingly, further direction for POUs to complete RPS compliance reports will be provided concurrently with CEC staff's completion of draft verification results for Compliance Period 3.

[Guidebook](#) (available at <https://efiling.energy.ca.gov/getdocument.aspx?tn=217317>) and the [RPS POU Regulations](#) is available at <https://efiling.energy.ca.gov/GetDocument.aspx?tn=238814&DocumentContentId=72218>.

2. New and Amended POU Contract Data and Documents

POUs must enter the required data about all new and amended contracts and ownership agreements, upload all required documents, and attest to the information in the [RPS Online System](#) (available at <https://rps.energy.ca.gov/>).

3. Contract Data Reporting for Long-Term Procurement Requirements

To support the verification of Long-Term Procurement Requirements (LTR) of submitted claims, POUs must identify the long-term classification for all contracts, amended contracts, and ownership agreements previously reported to the CEC, in accordance with section 3207 (c)(5)(B)1.i, CEC staff has prepared a [2020 Reporting Guidance for the LTR](#) document with additional detail on how POUs must report this information. This document is available at <https://www.energy.ca.gov/media/5883>.

4. e-Tag Reporting

For Portfolio Content Category (PCC) 1 and PCC 2 claims of energy scheduled into a California Balancing Authority (CBA) from outside of a CBA, POUs must complete and attest to the e-Tag report.

- a. For e-Tag data available in WREGIS, POUs must associate e-Tags in the subaccount with the corresponding claim and authorize WREGIS to submit the CA e-Tags Report to the CEC. Additional information on completing this process is available in the [WREGIS Reporting Instructions](#) (available at https://www.energy.ca.gov/sites/default/files/2021-06/2020%20WREGIS%20Reporting%20Guidance_ADA.pdf).
- b. For e-Tag data not available in WREGIS, POUs must complete and attest to the e-Tag Report in the [RPS Online System](#) (available at <https://rps.energy.ca.gov/>). POUs can enter data or upload the data directly into the system using the [e-Tag Report Form](#) template, found on the [RPS Verification and Compliance webpage](#) (available at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard>).

Please note: the POU e-Tag Report template has been updated for 2020 reporting and is now consistent with Americans with Disabilities Act (ADA) requirements. The updated accessible template is available in the [RPS Online System](#) (available at <https://rps.energy.ca.gov/>) and on the [RPS Verification and Compliance webpage](#) (available at: <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard>).

portfolio-standard/renewables-portfolio-standard) and must be used for reporting.

5. Hourly Report

For PCC 1 claims of energy scheduled into California from outside of a CBA, POUs must complete and attest to the [Hourly Report Form](https://www.energy.ca.gov/media/4085) (available at <https://www.energy.ca.gov/media/4085>) in the [RPS Online System](https://rps.energy.ca.gov) (available at <https://rps.energy.ca.gov>) and on the [RPS Verification and Compliance webpage](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard) (available at <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard>).

Please note: the POU Hourly Report template has been updated for 2020 reporting and is now consistent with ADA requirements. The updated accessible template is available in the [RPS Online System](https://rps.energy.ca.gov) (available at <https://rps.energy.ca.gov>) and on [RPS Verification and Compliance webpage](https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard) (available at: <https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard>) and must be used for reporting.

II. Annual Reporting Requirements for POUs Using Exemptions and Adjustments

1. RPS Reporting for POUs with Qualifying Large Hydroelectric Generation:

POUs with qualifying large hydroelectric generation meeting the criteria of Public Utilities Code section 399.30 (k)^{2,3} or 399.30 (l)⁴ reporting generation for Compliance Period Three are required to notify RPS staff by sending an email to RPSTrack@energy.ca.gov. POUs should refer to section 3204 (b)(6)-(8) related to qualifying large hydroelectric generation in the updated *RPS POU Regulations*.

Upon receipt of notification, RPS staff will enable fields within the Annual Summary Report to allow POUs' representatives to report the claim amounts and supplemental narrative information in the [RPS Online System](https://rps.energy.ca.gov) (available at: <https://rps.energy.ca.gov>).

2. RPS Reporting for POUs with a Voluntary Green Pricing or Shared Renewable Generation Program:

POUs with a voluntary green pricing program or shared renewable generation program reporting generation, to be excluded from its 2020 retail sales in

² As amended by Senate Bill 1393 (Stats. 2016, ch. 677).

³ As amended by Senate Bill 100 (Stats. 2018, ch. 312).

⁴ As amended by Senate Bill 350 (Stats. 2015, ch. 547).

accordance with Public Utilities Code section 399.30 (c)(4), should notify RPS staff by sending an email to RPSTrack@energy.ca.gov. POUs should also refer to section 3204 (b)(9) related to voluntary green pricing/shared renewable generation program generation exclusion in the updated *RPS POU Regulations*.

Upon receipt of notification, RPS staff will enable fields within the Annual Summary Report to allow POUs' representatives to report the claim amounts for exclusion and supplemental narrative information in the [RPS Online System](https://rps.energy.ca.gov) (available at: <https://rps.energy.ca.gov>).

3. RPS Reporting for POUs Meeting the Criteria of Public Utilities Code Section 399.18:

POUs meeting the criteria of Public Utilities Code section 399.18 should notify RPS staff by sending an email to RPSTrack@energy.ca.gov. POUs should also refer to section 3204 (b)(5) related to this exemption on the updated *RPS POU Regulations*.

Upon receipt of notification, RPS staff will enable fields within the Annual Summary Report to allow POUs' representatives to report the claim amounts for exclusion and supplemental narrative information in the [RPS Online System](https://rps.energy.ca.gov) (available at <https://rps.energy.ca.gov>), as required by section 3207 (n).

III. Reporting for POUs Electing Voluntary Early Compliance with the Long-Term Procurement Requirement for Compliance Period 3

In accordance with section 3207 (d)(4)(A) of the updated *RPS POU Regulations*, POUs electing to adopt rules for voluntary early compliance with the Long-Term Procurement Requirement (LTR) under sections 3206 (a)(1)(G) or section 3206 (a)(1)(I)3, must notify the CEC on this election before the reporting deadline of **August 13, 2021**. To support the verification of LTR claims, POUs must classify previously reported claims as long or short-term, as specified in section 3207 (c)(2)(E) of the updated *RPS POU Regulations*.

Additionally, POUs opting for voluntary early compliance with the LTR must submit all contracts, amendments, and ownership agreements executed in the prior year or earlier in accordance with section 3207 (c)(2)(F) of the updated *RPS POU Regulations*. Further reporting instructions on LTR claims and contract classification are available in the [2020 Reporting Guidance for the LTR](https://www.energy.ca.gov/media/5883) (available at <https://www.energy.ca.gov/media/5883>).